

Testimony Submitted to
SUBCOMMITTEE ON LIVESTOCK
AND HORTICULTURE

October 1, 2003

Concerning
SUPPORT FOR THE COUNTRY-OF-ORIGIN
LABELING LAW

Written Statement by

Mr. Hugh Warren
Executive Vice-President
Catfish Farmers of America
1100 Hwy 82 East Suite 202
Indianola, MS 38751

Mr. Chairman, Ranking Member and members of the Subcommittee, I appreciate the opportunity to provide testimony in support of the Country-of-Origin Labeling Law (COOL).

I am Hugh Warren and have been Executive Vice-President of Catfish Farmers of America, Inc., (CFA) since 1989. Founded in 1968, CFA is the trade organization representing the interests of the farm-raised catfish industry with current membership representing forty states. Producer members account for approximately 85 percent of total catfish production.

Over the past two decades, the U.S. catfish industry has grown from a relatively unknown segment of the U.S. seafood industry to the nation's largest aquaculture industry, accounting for over 70 percent by volume and over 60 percent by value of all U.S. aquaculture production of fish. Because farm-raised catfish has become a widely accepted food item throughout much of the U.S., (2002 production of 650 million lbs.), the demand for catfish should continue to increase as American consumers increasingly turn toward fish as part of a safe and nutritious diet.

The implementation of COOL should prove a minor issue with relatively no additional cost in the processing and marketing of catfish. For the most part, the catfish industry already meets the COOL requirements through the mandatory Food and Drug Administration's (FDA)¹ Hazard Analysis Critical Control Point (HACCP) systems for food safety. This HACCP plan requires processors of fish and fisheries products to identify hazards that are recognized with their products, and help them formulate control strategies.

The FDA has identified certain possible hazards in the growing of catfish. The preferred method of control is for the processing plant to have on file a document, updated each year by the producer, identifying the farm and producer on a guaranty agreement form.² This form certifies that fish shipped to the processor are hatched, raised, and harvested in the United States. By virtue of the processor being in the United States the requirements for COOL in the United States have been met.

In addition, under the Code of Federal Regulations, Food Labeling Regulations, April 1994, requires the name and place of business of manufacturer, packer or distributor of food to be identified on the label. The statement of the place of business shall include the street, city, state and zip code address.³

Many of the nation's trading partners already require their own version of COOL. For example, European Commission Labeling Decision for Seafoods: A new labeling system for fish and fishery products has been introduced by the European Commission. The new rule, which has been in effect since January 2002, stipulates that the label should have the following information on all fish products at the retail counter:

¹ 21 CFR 123.

² Fish & Fisheries Products Hazards & Controls Guide: 3rd Edition, June 2001.

³ 21 CFR 101.5.

- I. Whether the product is “farmed”, “cultivated” or “caught in the wild” in fresh or seawater.
- II. The country where the fish underwent its final processing state and
- III. The commercial name of the species being used for local sales along with the common term used in each member state. The scientific name is optional and can be displayed if the producer desires.

In an official statement, the Commission reported that considering the wide variety of species supplied, the EU considers it necessary to provide consumers with at least the basic minimum of information on the characteristics of aquaculture products. The new labeling rule, based on the traceability procedure, would impose additional responsibility on retailers, transporters and producers who have to keep accurate records on these aspects so that the officials can trace back the origin of the product and keep better control over quotas.⁴

In the United States, producers and processors have worked diligently to ensure that farm-raised catfish is safe, wholesome, and is just plain good to eat. I cannot imagine why anyone would want to hide the origin of their product and deny the consumer an informed choice.

Thank you Mr. Chairman for allowing me to testify today. I will be happy to answer any questions you or members of the Committee might have.

⁴ Fish Farming International, Dec. 2001.